

CLEMENT SETH ROBERTS (SBN 209203)
croberts@orrick.com
BAS DE BLANK (SBN 191487)
basdeblank@orrick.com
ALYSSA CARIDIS (SBN 260103)
acaridis@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759

SEAN M. SULLIVAN (pro hac vice)
sullivan@ls3ip.com
MICHAEL P. BOYEA (pro hac vice)
boyea@ls3ip.com
COLE RICHTER (pro hac vice)
richter@ls3ip.com
LEE SULLIVAN SHEA & SMITH LLP
656 W Randolph St., Floor 5W
Chicago, IL 60661
Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003

Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff and Counter-defendant,

v.

SONOS, INC.,

Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE ITS REPLY
IN SUPPORT OF MOTION TO STRIKE
PORTIONS OF GOOGLE'S EXPERT
INVALIDITY AND
NONINFRINGEMENT REPORTS**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos, Inc.’s Reply in Support of Motion to Strike Portions of Google’s Expert Invalidity and Noninfringement Reports (“Sonos’s Reply”). Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY ¹
Sonos’s Reply	Portions highlighted in blue	Google
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Entire Document	Google
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Portions in red boxes	Google and Sonos
Exhibit AA to Decl. of Moss	Entire Document	Google

II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” *See* L.R. 79-5(f).

III. GOOGLE LLC’S CONFIDENTIAL INFORMATION

Sonos seeks to seal the information and/or document(s) listed in the above table because they may contain information that Google considers Confidential and/or Highly Confidential-Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order entered by this Court. Dkt. 92. Except as noted in note 1, below, Sonos takes no position on the merits of sealing Google’s designated material, and expects Google to file one or more declarations in accordance with the Local Rules.

¹ With respect to the information and/or documents identified in the table, which contain confidential material designated by both parties, Sonos is concurrently filing an administrative motion to seal the same information on its *own* behalf.

1 **IV. CONCLUSION**

2 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-
3 listed documents accompany this Administrative Motion and redacted versions are filed publicly.
4 A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos
5 respectfully requests that the Court grant Sonos's Administrative Motion.

6 Dated: February 17, 2023

7 ORRICK HERRINGTON & SUTCLIFFE LLP
8 *and*
9 LEE SULLIVAN SHEA & SMITH LLP

10 By: /s/ Clement S. Roberts
11 Clement Seth Roberts

12 *Attorneys for Sonos, Inc.*